

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Fitzgerald & Associates P.C.  
Nicholas Fitzgerald, Esq. NF6129  
649 Newark Avenue  
Jersey City, NJ 07306  
Email: Nickfitz.law@gmail.com  
Telephone: (201) 533-1100  
Counsel for Debtor

In Re:

Lashonda McBurroughs

Case No.: 20-22696

Judge: Vincent F Papalia

Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION**

The debtor in this case opposes the following (choose one):

1. ☐ Motion for Relief from the Automatic Stay filed by \_\_\_\_\_ ,  
creditor,

A hearing has been scheduled for \_\_\_\_\_ , at \_\_\_\_\_ .

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_ , at \_\_\_\_\_ .

- ☒ Certification of Default filed by Freedom Mortgage Corporation ,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (choose one):

☐ Payments have been made in the amount of \$ \_\_\_\_\_ , but have not  
been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

A payment in the amount of \$2,295.00 will be mailed on August 2, 2024. The creditor's breakdown of payments is disorganized and it is incomprehensible. The creditor failed to state a specific dollar amount of the alleged post petition arrears.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 8/1/2024

Date: 8/1/2024

  
Debtor's Signature  
  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.